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## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91164357
Party	Plaintiff Padres L.P.
Correspondence Address	Antonio Borrelli Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036
Submission	Motion on Consent to Continue Suspension of Proceedings and to Extend Discovery Period if Opposition is Resumed
Filer's Name	Antonio Borrelli
Filer's e-mail	axb@cll.com, trademark@cll.com
Signature	/Antonio Borrelli/
Date	09/20/2005
Attachments	MUNDOPADRES.PDF ( 3 pages )

Docket No. 21307.022 TRADEMARK

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

PADRES L.P.,

Opposer,

Opposition No. 91 164,357

v.

:

ERESMAS INTERACTIVA, S.A., :

---- x

Applicant. :

----- x

## MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of six (6) months, until **April 7**, **2006**. Applicant's counsel consented to this motion, which is requested to allow the parties to pursue settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, in the event that the matter is taken out of suspense,

Opposer consents to an extension of time for Applicant to answer or otherwise respond to the

Notice of Opposition until sixty (60) days after the proceedings resume. Additionally, the

parties request that six months of discovery be allowed and that the discovery cut off be reset

to six (6) months after the proceedings resume so that the parties will have the full period of

discovery in the event that the matter is not able to be resolved. The trial periods should be

reset accordingly.

Dated: New York, New York

September 20, 2005

COWAN, LIEBOWITZ & LATMAN, P.C.

By /Antonio Borrelli/

Mary L. Kevlin Antonio Borrelli

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Attorneys for Opposer

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing MOTION ON CONSENT was sent via first class, postage paid mail to Applicant's attorney, Jeffrey L. Van Hoosear, Esq., Knobbe, Martens, Olson & Bear LLP, 2040 Main Street, 14th Floor, Irvine, CA 92614, on September 20, 2005.

/Antonio Borrelli/	
Antonio Borrelli	